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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

APRIL GREN BAWDEN,  
CHAD AUSTIN BAWDEN,  
JESSICA BJARNSON,  
MAKAIO. LYMAN CRISLER,  
PHILLIP GANNUSCIA,  
DUSTIN GARR, BARBARA JO  
JACKSON, BRENT GOLDBURN  
KNUDSON, ROBERT MCKINLEY, and  
RICHARD SCOTT NEMROW,

Defendants.

**SECOND BILL OF PARTICULARS**

Case No. 2:22CR00481 CW

Judge Clark Waddoups

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The United States of America hereby files the following Second Bill of Particulars for Forfeiture of Property.

The United States hereby gives notice that in accordance with its Notice of Intent to Seek Forfeiture in the Indictment, the United States provides the following updated list of assets for which it seeks forfeiture under 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1) and 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p):

- Real Property located at 229 E 60 N Lindon, UT 84042, legally described as:

The following lands lying in Utah County, UT:

All of Lot 1, KYSER MEADOWS SUBDIVISION, according to the official plat thereof, on file and of record in the office of the Utah County Recorder, State of Utah.

Tax ID: 44-187-0001

- All funds in account ending 2846 in the name of Target Fulfillment, LLC at Rock Canyon Bank
- All funds in account ending 8710 in the name of Target Fulfillment, LLC at Rock Canyon Bank
- All funds in account ending 8285 in the name of Energia, LLC at Central Bank
- All funds in account ending 5277 in the name of Elite Business Resources, LLC at America First Credit Union
- All funds in account ending 8372 in the name of Elite Business Resources, LLC at Chase Bank
  
- Nautique Paragon 25 boat, VIN: USCTC1R005E021
- 2020 Boat Trailer - Model 25 GT Tri, VIN: 5A7BB2533LT004781
- Porsche 911 convertible, VIN: WP0CB2A96LS263604
- Lamborghini Urus, VIN: ZPBUA1ZL7MLA13133
  
- A forfeiture money judgment equal to the value of any property not available for forfeiture as a result of any act or omission of the defendant(s) for one or more of the reasons listed in 21 U.S.C. § 853(p).

Respectfully submitted this 4<sup>th</sup> day of April, 2023.

TRINA A. HIGGINS  
United States Attorney

/s/ Cy H. Castle  
CY H. CASTLE  
Assistant U.S. Attorney